



September 28, 2017
Via ECFS Filing

Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

RE: WC 17-251
Talk America Services, LLC
Application to Discontinue Service

Dear Ms. Dortch:

On September 15, 2017, Talk America Services, LLC ("Applicant") filed an Application to Discontinue Service, pursuant to Title 47, Section 63.71, in which it proposed to discontinue the provision of local exchange, digital subscriber line and intrastate and interstate long distance services in certain locations in the state of Michigan. In accordance with the Commission's rules, the Applicant included a copy of the notice of discontinuance that was sent to the affected customers in Michigan. The Applicant proposed to discontinue service to those customers on or about November 1, 2017, pending regulatory approval.

To date, Public Notice of this Application has not been released. As a result of an inquiry to FCC Staff regarding the status of the Public Notice, Staff expressed concern that the customer notice might not comply with the Commission rule that requires such notices to include "points of geographic areas of service affected" (47 C.F.R. §63.71(a)(3)), because the body of the notice did not mention the state of Michigan.

The Applicant believes that the notice does comply with both the letter and the spirit of the Commission's rule. Each customer notice letter was sent to a specific customer address within the state of Michigan and the individual customer addresses were included on the letters. The notices stated: Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and long distance services in your service area on or after November 1, 2017..." We believe that the notice clearly states that the geographic area of service affected is the service area in which each of the affected customers who received notice resides. The Commission rule does not specifically require that the state be referenced in the notice. Even if that was the case, the Applicant submits that its customer notices are compliant, because the state (Michigan) is referenced in the customer addresses included on the notices.

Talk America Services, LLC respectfully submits that its customer notices comply with the Commission's rules, and requests that the Commission issue a Public Notice of the Application as expeditiously as possible, in order to enable the Applicant to discontinue service as requested.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant to Talk America Services, LLC

cc: Talk America Services